

# Exhibit 1

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

In re:

LEV GOLDFARB and  
LYDMILA ROGALIN,

Debtors

EUGENE PELIKHOV,

Plaintiff,

v.

GOLD AND FARB, INC.,  
LEV GOLDFARB,  
ALEXANDER GOLDFARB and  
LYDMILA ROGALIN,

Defendants.

**Chapter 13  
Case No. 16-12339-FJB**

**Adversary Proceeding  
No. 16-1131-FJB**

**Adversary Proceeding  
No. 16-01168-FJB**

**DECLARATION OF VALENTIN GURVITS**

I, Valentin Gurvits, do hereby declare as follows:

1. My name is Valentin Gurvits. I am over the age of 18 and am a Member of the Bar of the Commonwealth of Massachusetts. I am counsel of record for Plaintiff Eugene Pelikhov in the above captioned case. I make this declaration based on my own personal knowledge.

2. I know that there is a criminal proceeding pending against Mr. Lev Goldfarb in the Lynn District Court. The original probable cause hearing for the criminal charges against Mr. Lev Goldfarb was scheduled for March 20, 2017. Mr. Goldfarb and his attorney were present for the hearing at the Lynn District Court on that date.

3. The probable cause hearing for the criminal charges against Mr. Lev Goldfarb was rescheduled for May 1, 2017.

4. I did not attend the probable cause hearing on May 1, 2017 because I was out of the country at the time, but the hearing took place in my absence (but in the presence of the other victims) and at the hearing Mr. Lev Goldfarb provided testimony. Following this hearing, the Commonwealth determined that it would go forward with the criminal charges against Mr. Goldfarb.

5. Defendants' attorney, Mr. James Ehrhard, emailed me the executed Settlement Agreement on April 28, 2017, in an email entitled "Goldfarb settlement agreement", a copy of which is attached hereto as Exhibit A.

6. I emailed the Settlement Agreement counter-executed by Mr. Pelikhov to Defendants' Attorneys Ehrhard and von Timroth on April 29, 2017, a copy of my email is attached hereto as Exhibit B.

Signed under the pains and penalties of perjury on this 11th day of July, 2017.



Valentin Gurvits

**Val Gurvits**

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**From:** James Ehrhard <ehrhards@ehrhardslaw.com>  
**Sent:** Friday, April 28, 2017 2:44 PM  
**To:** Val Gurvits  
**Cc:** Vladimir von Timroth  
**Subject:** Goldfarb signed Settlement Agreement  
**Attachments:** Goldfarb Settlement Agreement.pdf

Val,

As we discussed, please find attached to this e-mail a copy of the settlement agreement signed by all party defendants.

Please forward me a copy of the agreement with the Plaintiff's signature. Once all signatures are affixed, I believe Vlad will file the proper pleadings with the bankruptcy court.

Thanks,

James

James P. Ehrhard, Esq.  
Ehrhard & Associates, P.C.  
250 Commercial Street, 4th Floor  
Worcester, MA 01608  
tel: 508.791.8411  
[www.ehrhardlaw.com](http://www.ehrhardlaw.com)

## Val Gurvits

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**From:** Val Gurvits  
**Sent:** Saturday, April 29, 2017 4:13 PM  
**To:** 'James Ehrhard'  
**Cc:** Vladimir von Timroth; Matthew Shayefar; Gary W. Cruickshank (gwc@cruickshank-law.com)  
**Subject:** RE: Goldfarb signed Settlement Agreement  
**Attachments:** Settlement Agreement - Pelikhov Goldfarb CLEAN copy 4-27-17.pdf; Settlement Agreement - Pelikhov Goldfarb faxed copy 4-27-17.pdf

James/Vlad,

Attached is the fully executed Settlement Agreement. I provide two PDFs – one with the faxed copy and a second with a CLEANly printed agreement and the faxed signature page attached – the Clean one is easier to read so I suggest you use that one.

I will await the Court's approval and receipt of the Initial Payment, and then file the dismissal with prejudice – the motion to dismiss will be a joint motion and I will provide a draft for your approval before filing.

Best,

Val Gurvits  
Boston Law Group, PC  
825 Beacon Street, Suite 20  
Newton Centre, MA 02459  
(617) 928-1804 direct  
(617) 928-1800 main  
(617) 928-1802 fax  
[vgurvits@bostonlawgroup.com](mailto:vgurvits@bostonlawgroup.com)

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The contents of this message and any attachments are confidential and intended only for the addressee(s). This message may also be subject to attorney-client privilege. If you received this message in error, please notify Boston Law Group, PC immediately and destroy the original message.

Boston Law Group, PC  
tel: 617/928-1800  
e-mail: [info@bostonlawgroup.com](mailto:info@bostonlawgroup.com)

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James

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